

Exhibit 1

**INDEX TO PLEADINGS AND EXHIBITS ON FILE WITH
BANKRUPTCY COURT RELATING TO ZONOLITE CLAIMS**

Tab #	Description	Date Filed/Cross-Reference to Ex. No.
PLEADINGS FILED IN BANKRUPTCY PROCEEDINGS RELATING TO ZONOLITE CLAIMS		
1.	Zonolite Plaintiffs' Objection to Debtors' Motion for Entry of Case Management Order, Establishment of Bar Date, Approval of Proof of Claim Forms and Approval of Notice Program (Docket No. 536); Motion to Extend the Time to Object or Respond to Such Motions; Joinder in Motion for Continuance by Official Committee of Asbestos Property Damage Claimants; Independent Motion to Continue the Hearing on Debtors' Motion; and Request for Consideration and Briefing Regarding Class Treatment ("CMO Objection")	July 13, 2001
2.	Declaration of Fabrice N. Vincent in Support of CMO Objection ("CMO Objection Vincent Decl.")	July 13, 2001
3.	<i>Lewis v. W.R. Grace</i> Opening Memorandum of Points and Authorities in Support of Zonolite Plaintiffs' Motion for Class Certification ("Class Certification")	November 15, 2001
4.	<i>Lewis v. W.R. Grace</i> Declaration of Attorney Fabrice N. Vincent in Support of Zonolite Plaintiffs' Motion for Class Certification ("Class Certification Vincent Decl."). Also attached is Exhibit M, Declaration of Attorney Richard S. Lewis (referenced exhibits are provided below).	November 15, 2001
5.	Zonolite Claimants' Informational Brief re: Class Proofs of Claim	February 19, 2002
EXHIBITS TO ABOVE-REFERENCED PLEADINGS FILED IN BANKRUPTCY PROCEEDINGS		
Grace Internal Memoranda, Correspondence, Advertising and Testing Documentation		
6.	Early Zonolite brochure documenting the public representations concerning the safety of Zonolite attic insulation. Attached is color demonstrative including a photograph of the front of a bag of Zonolite attic insulation.	CMO Objection Vincent Decl. Ex. 3 Class Certification Vincent Decl. Exs. G and M (Lewis Decl. Ex. 43) ¹

¹ Exhibit M is the Declaration of Attorney Richard S. Lewis, filed in the *Price v. W.R. Grace* class action (under Tab 4 of this Notebook). Attached to the Lewis Declaration are numerous exhibits. Those exhibits are referenced herein as "Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. ____)"

Tab #	Description	Date Filed/Cross-Reference to Ex. No.
7.	Advertisements used to market Zonolite vermiculite insulation in November of 1960, and a Zonolite brochure used beginning 1950 to describe how to use Zonolite attic insulation. Attached is a demonstrative exhibit.	CMO Objection Vincent Decl. Ex. 4 Class Certification Vincent Decl. Exs. H and M (Lewis Decl. Ex. 44)
8.	Report dated August 8-9, 1956 by the Montana State Board of Health on the Zonolite operation at Libby, Montana.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 14)
9.	September 12, 1956 report from Benjamin Wake, acting industrial hygiene engineer for the Montana Department of Environmental Quality, to Dohrman H. Byers, Assistant Chief, Toxicological Section of United States Public Health Service, documenting the asbestos content in the Zonolite ore in its relationship to asbestos in the dust in the air pertaining to vermiculite mined at Libby, Montana.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 8)
10.	July 20, 1959 report from Libby physician J.M. Cairns to the manager of the Libby mine documenting 48 abnormal chest x-rays out of 130 people examined.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 15)
11.	Letter dated June 14, 1961 from Earl Lovick, manager of the Zonolite mill in Libby, Montana to C.A. Pratt, Vice President of Western Mineral Products Company documenting Grace's knowledge of the large amount of asbestos dust generated by vermiculite mined at Libby.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 16)
12.	10/6/64 Chicago Daily News article entitled "Suspect Asbestos a Cancer Source."	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 17)
13.	Report with a cover letter dated May 11, 1964 of the Montana State Board of Health regarding the asbestos problem arising out of Libby's handling of vermiculite.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 18)
14.	Study performed by Grace documenting incidence of lung disease among Libby workers from 17% of the one to five year service group, "climbing to 92% in the 21 to 25 year service group." Attached to this Grace document is a color demonstrative exhibit graphing the data from the exhibit summary.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 19)
15.	March 1969 memos from Charles Dugan and Peter Kostic of Grace's Industrial Hygiene Department copied to high-level Grace executives including Rodney Vining, President of the Construction Products Division and R.W. Sterrett, vice President of the Zonolite operations. Attached is a color demonstrative exhibit.	CMO Objection Vincent Decl. Ex. 13 Class Certification Vincent Decl. Exs. J and M (Lewis Decl. Ex. 20)

Tab #	Description	Date Filed/Cross-Reference to Ex. No.
16.	March 11, 1976 memo to H.A. Brown, Executive Vice President of the Zonolite Operations, and copied to Henry Eschenbach, Grace's chief industrial hygienist; Rodney Vining, President of the Construction Products Division; J.W. Wolter, Zonolite's vice president in charge of mining and manufacturing; and O.M. Favorito, General Counsel for W.R. Grace, Industrial Chemicals Group. This exhibit documents Grace's knowledge of the excessive fiber levels generated by use of Zonolite attic fill. Attached is a color demonstrative exhibit.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 21)
17.	July 11, 1976 report of testing of asbestos generation by simulated tests installing Zonolite attic fill conducted out of Grace's expanding plant near Weedsport, New York, which report was copied to Grace's chief industrial hygienist, Henry Eschenbach; Grace Executive Vice President for Zonolite, E.S. Wood; and Grace's President in charge of Construction Products Division, Rodney M. Vining. Attached is a color demonstrative exhibit.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 35)
18.	Memo dated 4/19/77 to Wood from Yang regarding tremolite content of Zonolite products.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 9)
19.	Memo dated May 24, 1977 from E.S. "Chip" Wood, Executive Vice President of Zonolite Operations, to Charles N. Graf, Vice President of W.R. Grace & Co. for the Industrial Chemicals Division, with copies to other high-level Grace executives including Rodney M. Vining, President of the Construction Products Division. The first page of Exhibit 10 is a demonstrative exhibit created by our office to highlight some of the quotations found within the memo.	CMO Objection Vincent Decl. Ex. 12 Class Certification Vincent Decl. Exs. I and M (Lewis Decl. Ex. 10)
20.	1978 (dated April 3, 1975(sic)) performance report of W.R. Grace's U.S. Zonolite operations documenting the tonnage of milling capacity at the Libby operation.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 6)
21.	3/25/80 memo to McCord from Eaton regarding Consumer Products.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 37)
22.	4/1/80 letter to Ray from Wood regarding testing and protocols.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 36)
23.	Memo to Bettacchi from Ciampa re Monthly Report of insulation sales (Sept. 83).	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 7)

Tab #	Description	Date Filed/Cross-Reference to Ex. No.
24.	11/1/85 Grace memo regarding lung cancer risk assessment (30,000 people).	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 23)
25.	Excerpts from the 10/23/91 deposition of Robert Junker together with a demonstrative exhibit created therefrom.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 22)
EPA and OSHA Publications (pre-2000)		
26.	EPA Orange Book, Asbestos-Containing Material in School Buildings: A Guidance Document (March 1979), Part 1, p. 1.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 39)
27.	EPA, <i>Friable Asbestos-Containing Materials in Schools; Proposed Identification and Notification</i> , 45 Fed. Reg. 182, p. 61969 dated 9/17/80.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 40)
28.	NIOSH Pamphlet No. 81-103, <i>Workplace Exposure to Asbestos</i> (November 1980), p. 3.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 38)
29.	EPA Blue Book, <i>Guidance for Controlling Friable Asbestos-Containing Materials in Buildings</i> (March 1983), p. 1-1	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 41)
30.	"Guidance for Controlling Asbestos-Containing Materials in Buildings," U.S. EPA (1985) (known as the "Purple Book").	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 26)
31.	EPA <i>Airborne Asbestos Health Assessment Update</i> (June 1986), p. 72.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 42)
32.	EPA, Asbestos-Containing Materials in Schools, Final Rule and Notice, 52 Fed. Reg. 41826 (Oct. 30, 1987).	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 34.1)
33.	EPA Report to Congress of <i>Asbestos-Containing Materials in Public Buildings</i> , February 1988, p. 5.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 33)
34.	"Managing Asbestos in Place," U.S. EPA (1990) (known as the "Green Book").	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 27)
35.	OSHA Fed. Reg., Vol. 59, No. 153, August 10, 1994, at p. 40978.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 34)
Documents Relating to Zonolite Actions: Barbanti (Washington State) and Price (National)		
36.	Order Granting Class Certification filed on December 19, 2000, in <i>Barbanti v. W.R. Grace, et al.</i> (Spokane Co. Case No. 00-2011756-6) Washington state class action with attached Memorandum Decision.	CMO Objection Vincent Decl. Ex. 8 Class Certification Vincent Decl. Exs. A and M (Lewis Decl. Exs. 1 & 2)

Tab #	Description	Date Filed/Cross-Reference to Ex. No.
37.	Order Denying Plaintiffs' Motion for Preliminary Injunction and Emergency Notice to Class Members filed on January 29, 2001, in <i>Barbanti v. W.R. Grace, et al.</i> (Spokane Co. Case No. 00-2011756-6) Washington state class action with attached Memorandum Decision.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Exs. 3 & 4)
38.	Henry Anderson, M.D. Affidavit filed in <i>Barbanti v. W.R. Grace, et al.</i> (Spokane Co. Case No. 00-2011756-6) Washington state class action. Note: This Affidavit with attachments was also filed in <i>Price v. W.R. Grace, et al.</i> (U.S. District Court, Dist. of Mass. No. CV 0071-M-DWM, MDL 1376) national class action.	CMO Objection Vincent Decl. Ex. 9 Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 25)
39.	Richard Hatfield Affidavit filed in <i>Barbanti v. W.R. Grace, et al.</i> (Spokane Co. Case No. 00-2011756-6) Washington state class action. Mr. Hatfield is a certified environmental consultant and the Senior Asbestos Consultant at Materials Analytical Services. Note: This Affidavit with attachments was also filed in <i>Price v. W.R. Grace, et al.</i> (U.S. District Court, Dist. of Mass. No. CV 0071-M-DWM, MDL 1376) national class action.	CMO Objection Vincent Decl. Ex. 10 Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 32)
40.	Donald J. Hurst Affidavit filed in <i>Barbanti v. W.R. Grace, et al.</i> (Spokane Co. Case No. 00-2011756-6) Washington state class action. Mr. Hurst is the President of Fulcrum Environmental Consulting. Note: This Affidavit with attachments was also filed in <i>Price v. W.R. Grace, et al.</i> (U.S. District Court, Dist. of Mass. No. CV 0071-M-DWM, MDL 1376) national class action.	CMO Objection Vincent Decl. Ex. 11 Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 28)
41.	GMA Research Corporation, Washington State Survey Preliminary Findings	CMO Objection Vincent Decl. Ex. 5
42.	GMA Research Corporation, Washington State Survey, Summary Report, October 2000.	CMO Objection Vincent Decl. Ex. 6 Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 49) Class Proofs of Claim Brief, App. B
43.	Testimony of Don Morgan, pp. 82-83, given in <i>Barbanti v. W.R. Grace, et al.</i> (Spokane Co. Case No. 00-2011756-6) Washington state class action.	CMO Objection Vincent Decl. Ex. 7

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44.	<i>Barbanti v. W.R. Grace, et al.</i> , (Spokane Co., Case No. 00201756-6), Proposed Rule 23 (d)(2) Notice.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 5)
45.	Affidavit of homeowner John Holbrook (July 21, 2000) filed in <i>Price v. W.R. Grace, et al.</i> (U.S. District Court, Dist. of Mass. No. CV 0071-M-DWM, MDL 1376) national class action.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 45)
46.	Affidavit of homeowner Randy Hatch (July 20, 2000) filed in <i>Price v. W.R. Grace, et al.</i> (U.S. District Court, Dist. of Mass. No. CV 0071-M-DWM, MDL 1376) national class action.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 46)
47.	Affidavit of homeowner Ralph Busch (July 20, 2000) filed in <i>Price v. W.R. Grace, et al.</i> (U.S. District Court, Dist. of Mass. No. CV 0071-M-DWM, MDL 1376) national class action.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 47)
48.	Affidavit of homeowner Brendan King (July 19, 2000) filed in <i>Price v. W.R. Grace, et al.</i> (U.S. District Court, Dist. of Mass. No. CV 0071-M-DWM, MDL 1376) national class action.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 48)
49.	Information obtained from the U.S. Census Bureau internet site (http://www.census.gov) entitled "Expenditures for Residential Improvements and Repairs by Property Type, Quarterly 1962-1998."	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 11)
50.	Information obtained from the U.S. Census Bureau internet site (http://www.census.gov) entitled "Expenditures to Owner-Occupied Properties by Type of Job: 1993 to 1998" and "Expenditures to Rental Properties by Type of Job: 1993 to 1998."	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 12)
51.	Information obtained from the U.S. Census Bureau internet site (http://www.census.gov) entitled "Expenditures for Improvements and Repairs of Residential Properties Second Quarter 1999" with attached Tables showing Expenditures for Maintenance and Repairs and Improvement for 1988 to 1999.	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 13)
Recent Findings and Information on Zonolite and Libby		
52.	EPA Action Memorandum (May 23, 2000) which was attached as Attachment 1 to EPA Unilateral Administrative Order for Removal Response Activities (May 24, 2000).	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 50)
53.	June 28, 2000 ATSDR web page, "Questions and Answers, Exposure to Asbestos in Insulation."	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 31)

Tab #	Description	Date Filed/Cross-Reference to Ex. No.
54.	Letter dated August 1, 2000, from Hugh Sloan, United States Public Health Service Assistant Surgeon General, to Linda Rosenstock, Directory of the National Institute for Occupational Safety & Health regarding Libby, Montana vermiculite.	CMO Objection Vincent Decl. Ex. 1 Class Certification Vincent Decl. Ex. E
55.	September 2000 Region 10 EPA Fact Sheet, "Asbestos in Attic Insulation."	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 30)
56.	EPA Region 8 website page providing questions and answers about asbestos and the EPA's Libby investigation found at http://www.epa.gov/region8/superfund/libby/qverm-home2.html	Class Certification Vincent Decl. Ex. B
57.	October 9, 2000 Region 1 EPA web page, "Q&A Regarding Vermiculite Insulation."	Class Certification Vincent Decl. Ex. M (Lewis Decl. Ex. 29)
58.	Publication entitled "Asbestos in Vermiculite Insulation," published by the United States EPA Office of Pollution Prevention and Toxics (December 29, 2000).	Class Certification Vincent Decl. Exs. C and M (Lewis Decl. Ex. 24)
59.	<i>Preliminary Findings of Medical Testing of Individuals Potentially Exposed to Asbestoform Minerals Associated with Vermiculite in Libby, Montana: An Interim Report for Community Health Planning</i> by the Department of Health and Human Services, Agency for Toxic Substances and Disease Registry ("ATSDR") dated February 22, 2001.	CMO Objection Vincent Decl. Ex. 2 Class Certification Vincent Decl. Ex. F
60.	United States Department of Justice's <i>Response to Debtors' Motion for Entry of Case Management Order, Motion to establish Bar Date, Motion to Approve Claim Form, and Motion to Approve Notice Program</i> dated July 12, 2001, filed in <i>W.R. Grace</i> Bankruptcy No. 01-01139	Class Certification Vincent Decl. Ex. D
61.	Christopher P. Weis, United States Environmental Protection Agency Memorandum re: Amphibole Mineral Fibers in Source Materials in Residential and Commercial Areas of Libby Pose an Imminent and Substantial Endangerment to Public Health, dated December 20, 2001.	Class Proofs of Claim Brief, App. A
	BANKRUPTCY PLEADING NOT ATTACHED HERETO (on file with Bankruptcy Court): <i>Debtors' Motion for Leave to File Omnibus Reply to Various Objections to the Debtors' Motion for Entry of Case Management Order, Establishment of a Bar Date, Approval of the Proof of Claim Forms and Approval of the Notice Program (re: Docket No. 545).</i>	Class Certification Vincent Decl. Ex. L Filed November 9, 2001

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